

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

KALEKI OLIVER, ) CV NO. 04-00409 HG/BMK  
                  )  
Plaintiff,       ) DECLARATION OF JORDAN  
                  ) GOMEZ  
vs.                )  
                  )  
OHANA PACIFIC MANAGEMENT INC.; )  
HALE KUPUNA HERITAGE HOME,     )  
LLC, JORDAN GOMEZ; and KURT    )  
AKAMINE,            )  
                  )  
Defendants.       )  
                  )  
                  )

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DECLARATION OF JORDAN GOMEZ

JORDAN GOMEZ declares the following:

1. I am currently employed as a Certified Nurses Aide by Defendant Hale Kupuna Heritage Home, LLC (“Hale Kupuna”). I have worked in that position at Hale Kupuna since May 23, 2000. I formerly worked with Plaintiff Kaleki Oliver (“Plaintiff”). I make this Declaration upon facts and information personally known to me except in those instances where statements are made upon information and belief and, in those instances, I believe them to be true.

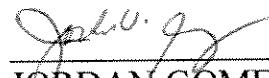
**EXHIBIT B**

2. Plaintiff has made sexual harassment allegations in this case based in part upon an alleged incident that occurred when we were scheduled to work together one night at Hale Kupuna in or around late February to early March 2003.

3. On or around May 19, 2003, which was over two months after Plaintiff and I worked together in late February to early March 2003, Plaintiff filed a police report against me. Ultimately, the authorities declined to prosecute Plaintiff's criminal case against me.

Pursuant to 28 U.S.C. § 1746(2), I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 3, 2005.



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JORDAN GOMEZ